

SPRING 2021



Environmental Health & Safety From Experience

OSHA Training: Is Your Plant Compliant?

The hiring shortages in the manufacturing sector means that there is a constant in-flow of new employees within many plants today. If your plant is experiencing a hiring surge, don't forget about your regulatory training! The Occupational Safety and Health Administration (OSHA), backed by the new administration's increase in budget for inspections and inspectors, will be reviewing plant compliance with required training. With many plants issuing N-95 respirators as part of their COVID-19 protection plans, one area of particular concern to OSHA will be respiratory protection. Other OSHA-required training areas include:

- Hazard Communication
- Powered Industrial Truck
- Confined Space Entry
- Process Safety Management
- Lockout/Tagout
- Bloodborne Pathogens
- First Aid
- CPR
- Hot Work
- Personal Protective Equipment
- Hearing Conservation
- Emergency Response and Action

As you plan your training, keep in mind these tips from Hixson to improve your training efforts:

- Evaluate needs on the basis of national, state, local and plant-specific training requirements. Start with the regulatory requirements of your particular industry. The nature of your company's business will also be a major factor in what training is required. After that, examine the risks your plant faces and determine if your personnel have all the training and knowledge required to deal with emergency situations.
- Cover all bases. Just because you have only a few needs in one area does not mean you can overlook

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EXPERIENCE IN BRIEF

The annual July 1 reporting deadline for the USEPA SARA 313 Toxic Release Inventory (TRI) for chemicals is approaching! Keep in mind the possible need to report for the following Food Industry Chemicals: Ammonia, Chlorine, Nitric Acid, Sodium Nitrate, other Nitrate compounds. All of these contribute directly or indirectly towards releases that may need to be reported.

them entirely. Make sure you are covering all the bases in the environmental, health and/or safety sectors. For example, if confined spaces are not a major concern because entry is prohibited, spend less time on that subject. Look at worker's compensation issues and take a cue from there. Go back and review your injury reports to determine where the problems were (e.g., slips, trips and falls, machine guarding, lifting) and hit those areas.

- Develop a frequency policy. Most training requirements are unambiguous: Training may be required initially, annually or every three years. While these requirements are easy to decipher, not so easy are the ones that require "periodic" updates. At the same time, even those requirements that only specify initial training (e.g., hazard communication) could leave your company open to gaps: After all, is it really the most prudent course to train your employees once and never do it again? To build a positive safety culture, develop a policy to make it clear how often employees need to be trained for each subject matter.
- Re-examine training methodologies and delivery mechanisms. Studies show that people learn in different ways. Make sure your training addresses all of the learning types (audio, visual and physical, also known as kinesthetic) for maximum effectiveness. In addition, training delivery methods should also be re-assessed periodically to make information more memorable for employees.

To learn more about required training programs from OSHA as well as the Environmental Protection Agency (EPA), [check out this list](#) developed by Hixson which outlines frequencies for each program and provides additional links for more information.

RELATED CONTENT

- [OSHA Coronavirus Information](#)
- [OSHA Training Requirements Pamphlet – Look for “General Industry” section](#)

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CONTACT US

Direct any comments or questions to:

Joe Weisgerber, P.E., CPEA

Manager, Environmental Engineering/
Health & Safety

jweisgerber@hixson-inc.com

Phone: 513.241.1230

Fax: 513.241.1287

www.hixson-inc.com